

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; STATE OF  
NEW YORK; STATE OF HAWAI'I; STATE  
OF ARIZONA; STATE OF CALIFORNIA;  
STATE OF COLORADO; STATE OF  
CONNECTICUT; STATE OF DELAWARE;  
STATE OF ILLINOIS; STATE OF MAINE;  
STATE OF MARYLAND;  
COMMONWEALTH OF  
MASSACHUSETTS; PEOPLE OF THE  
STATE OF MICHIGAN; STATE OF  
MINNESOTA; STATE OF NEVADA;  
STATE OF NEW JERSEY; STATE OF NEW  
MEXICO; STATE OF OREGON; STATE OF  
VERMONT; STATE OF WASHINGTON;  
STATE OF WISCONSIN;

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States; INSTITUTE  
OF MUSEUM AND LIBRARY SERVICES;  
KEITH E. SONDERLING, in his official  
capacity as Acting Director of the Institute of  
Museum and Library Services; MINORITY  
BUSINESS AND DEVELOPMENT  
AGENCY; MADIHA D. LATIF, in her  
official capacity as Deputy Under Secretary of  
Commerce for Minority Business  
Development; HOWARD LUTNICK, in his  
official capacity as Secretary of Commerce;  
FEDERAL MEDIATION AND  
CONCILIATION SERVICE; GREG  
GOLDSTEIN, in his official capacity as  
Acting Director of the Federal Mediation and  
Conciliation Service; OFFICE OF  
MANAGEMENT AND BUDGET; RUSSELL  
T. VOUGHT, in his official capacity as  
Director of the Office of Management and  
Budget

Defendants.

Case No. 1:25-cv-128

**SUPPLEMENTAL DECLARATION OF ANIND DEY**

I, Anind Dey, hereby declare:

1. I am a resident of the State of Washington. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge, except as to those matters stated upon information and belief. If called as a witness, I could and would testify competently to the matters set forth below.

2. I previously provided a declaration in this case attesting to the IMLS funds received by the University of Washington iSchool faculty. *See* ECF No. 3-33.

3. On April 9, 2025, iSchool faculty members that received funding from IMLS began receiving Notices of Grant Terminations. Of the IMLS grants that supported iSchool faculty's work and scholarship, eight have been terminated as of the signing of this declaration.

4. Based on my review of the termination notices, each contains the same language explaining why the grants have been terminated. The notices state that the terminated grants are "no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program." The notices also indicate that the "IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda" and that the President's Executive Order mandates that IMLS "eliminate all non-statutorily required activities and functions."

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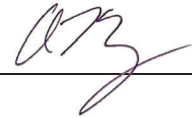
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5. A true and correct copy of the termination notices received by iSchool faculty is attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED and SIGNED this 11th day of April 2025, at Seattle, Washington.

ANIND DEY, PH.D.

A handwritten signature in purple ink, appearing to be 'AD', is written over a horizontal line.

# Exhibit A



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES  
ACTION MEMORANDUM**

April 8, 2025

**FROM:** Keith Sonderling, Acting Director

**SUBJECT:** Authorization for Termination of Grant(s)

**Purpose:**

This memorandum authorizes the termination of federal grants administered by the Institute of Museum and Library Services (IMLS), effective April 8, 2025, in alignment with the agency's updated priorities and the President's Executive Order 14238, *Continuing the Reduction of the Federal Bureaucracy*, issued on March 14, 2025.

**Action:**

I hereby authorize the termination of the attached federal grant(s), effective April 8, 2025, pursuant to the terms in the attached exhibit(s).

**Attachment:**

See the attached *Exhibit Grant Notice* for the template of the individual grant termination notice to be issued to each of the grantees.

**Contact:**

Questions regarding this action may be directed to [grant-notices@imls.gov](mailto:grant-notices@imls.gov).

Sincerely,

*Keith Sonderling*

**Keith Sonderling**

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024

**Attachment:** Exhibit Grant Notice

**INSTITUTE OF MUSEUM AND LIBRARY SERVICES****NOTICE OF GRANT TERMINATION**

April 8, 2025

Hala Annabi, Carol Rhodes

hpannabi@uw.edu, osp@uw.edu

Dear IMLS Grantee,

This letter provides notice that the Institute of Museum and Library Services (IMLS) is terminating your federal grant (Grant Application No. RE-252303-OLS-22) effective April 8, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, IMLS has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program. IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the IMLS eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the IMLS hereby terminates your grant in its entirety effective April 8, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by IMLS after the termination of the agreement.

Please contact [grant-notice@imls.gov](mailto:grant-notice@imls.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Keith Sonderling

Keith Sonderling

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES  
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Sincerely,

*Keith Sonderling*

**Keith Sonderling**

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024

**Attachment:** Exhibit Grant Notice

**INSTITUTE OF MUSEUM AND LIBRARY SERVICES****NOTICE OF GRANT TERMINATION**

April 8, 2025

Jason Yip, Carol Rhodes

jcyip@uw.edu, osp@uw.edu

Dear IMLS Grantee,

This letter provides notice that the Institute of Museum and Library Services (IMLS) is terminating your federal grant (Grant Application No. LG-256571-OLS-24) effective April 8, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, IMLS has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program. IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the IMLS eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the IMLS hereby terminates your grant in its entirety effective April 8, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by IMLS after the termination of the agreement.

Please contact [grant-notice@imls.gov](mailto:grant-notice@imls.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Keith Sonderling

Keith Sonderling

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024





**INSTITUTE OF MUSEUM AND LIBRARY SERVICES  
ACTION MEMORANDUM**

April 8, 2025

**FROM:** Keith Sonderling, Acting Director

**SUBJECT:** Authorization for Termination of Grant(s)

**Purpose:**

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**Action:**

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Sincerely,

*Keith Sonderling*

**Keith Sonderling**

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024

**Attachment:** Exhibit Grant Notice



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES**

**NOTICE OF GRANT TERMINATION**

April 8, 2025

Jason Yip, Carol Rhodes

jcyip@uw.edu, osp@uw.edu

Dear IMLS Grantee,

This letter provides notice that the Institute of Museum and Library Services (IMLS) is terminating your federal grant (Grant Application No. LG-252291-OLS-22) effective April 8, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, IMLS has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program. IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the IMLS eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the IMLS hereby terminates your grant in its entirety effective April 8, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by IMLS after the termination of the agreement.

Please contact [grant-notices@imls.gov](mailto:grant-notices@imls.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Keith Sonderling

Keith Sonderling

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES  
ACTION MEMORANDUM**

April 8, 2025

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Sincerely,

*Keith Sonderling*

**Keith Sonderling**

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024

**Attachment:** Exhibit Grant Notice



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES**

**NOTICE OF GRANT TERMINATION**

April 8, 2025

Jin Ha Lee, Carol Rhodes

Jinhalee@uw.edu, osp@uw.edu

Dear IMLS Grantee,

This letter provides notice that the Institute of Museum and Library Services (IMLS) is terminating your federal grant (Grant Application No. LG-256564-OLS-24) effective April 8, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, IMLS has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program. IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the IMLS eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the IMLS hereby terminates your grant in its entirety effective April 8, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by IMLS after the termination of the agreement.

Please contact [grant-notices@imls.gov](mailto:grant-notices@imls.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Keith Sonderling

Keith Sonderling

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024



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Sincerely,

*Keith Sonderling*

**Keith Sonderling**

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024

**Attachment:** Exhibit Grant Notice



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES**

**NOTICE OF GRANT TERMINATION**

April 8, 2025

Marika Cifor, Carol Rhodes

mcifor@uw.edu, osp@uw.edu

Dear IMLS Grantee,

This letter provides notice that the Institute of Museum and Library Services (IMLS) is terminating your federal grant (Grant Application No. LG-256575-OLS-24) effective April 8, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, IMLS has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program. IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the IMLS eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the IMLS hereby terminates your grant in its entirety effective April 8, 2025.

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Please contact [grant-notices@imls.gov](mailto:grant-notices@imls.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Keith Sonderling

Keith Sonderling

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES  
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Sincerely,

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**Keith Sonderling**

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024

**Attachment:** Exhibit Grant Notice



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES**

**NOTICE OF GRANT TERMINATION**

April 8, 2025

Marika Cifor, Adelia Yee, Carol Rhodes

mcifor@uw.edu, ayee@uw.edu, osp@uw.edu

Dear IMLS Grantee,

This letter provides notice that the Institute of Museum and Library Services (IMLS) is terminating your federal grant (Grant Application No. RE-252305-OLS-22) effective April 8, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, IMLS has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program. IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the IMLS eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the IMLS hereby terminates your grant in its entirety effective April 8, 2025.

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Sincerely,

/s/ Keith Sonderling

Keith Sonderling

Acting Director

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Sincerely,

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**Keith Sonderling**

Acting Director

[ksonderling@imls.gov](mailto:ksonderling@imls.gov)

955 L'Enfant Plaza SW #4000, Washington, DC 20024

**Attachment:** Exhibit Grant Notice



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES**

**NOTICE OF GRANT TERMINATION**

April 8, 2025

Nicholas Weber, Carol Rhodes

[nmweber@uw.edu](mailto:nmweber@uw.edu), [osp@uw.edu](mailto:osp@uw.edu)

Dear IMLS Grantee,

This letter provides notice that the Institute of Museum and Library Services (IMLS) is terminating your federal grant (Grant Application No. RE-252290-OLS-22) effective April 8, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, IMLS has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program. IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the IMLS eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the IMLS hereby terminates your grant in its entirety effective April 8, 2025.

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Sincerely,

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Keith Sonderling

Acting Director

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955 L'Enfant Plaza SW #4000, Washington, DC 20024



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Acting Director

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955 L'Enfant Plaza SW #4000, Washington, DC 20024

**Attachment:** Exhibit Grant Notice



**INSTITUTE OF MUSEUM AND LIBRARY SERVICES**

**NOTICE OF GRANT TERMINATION**

April 8, 2025

Stacey Wedlake, Carol Rhodes

staceyaw@uw.edu, osp@uw.edu

Dear IMLS Grantee,

This letter provides notice that the Institute of Museum and Library Services (IMLS) is terminating your federal grant (Grant Application No. LG-256579-OLS-24) effective April 8, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, IMLS has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the IMLS Program. IMLS is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the IMLS eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the IMLS hereby terminates your grant in its entirety effective April 8, 2025.

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